

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PAUL CALDWELL,

Plaintiff,

Case No.:

v.

TRANSWORLD SYSTEMS INC.

Defendant.

_____ /

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant, Transworld Systems Inc. (“Defendant”), by its attorney, hereby removes this action from the Superior Court of New Jersey, Law Division, Special Civil Part, Small Claims, Essex County, to the United States District Court for the District of New Jersey.

In support of this Notice of Removal, Defendant states as follows:

1. Plaintiff Paul Caldwell originally commenced this action by filing a Summons and Complaint against Defendant in the Superior Court of New Jersey, Law Division, Special Civil Part, Small Claims, Essex County, where it is presently captioned as *Paul Caldwell v. Transworld Systems Inc.* Docket No. SC-000183-25. No further proceedings before the State court have occurred.

2. In the Complaint, plaintiff alleges a statutory cause of action against Defendant. A true and correct copy of the Complaint is attached hereto as Ex. “A.”

3. Plaintiff accuses Defendant of violating the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.* and the Fair Credit Reporting Act, 15 U.S.C. (“FCRA”) § 1681 *et seq.*

4. Defendant received Plaintiff’s Summons and Complaint on or about February 7, 2025.

5. This Court has jurisdiction over Plaintiff’s claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claim is founded upon a claim or right arising under the laws of the United States.

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which Defendant received Plaintiff’s Summons and Complaint. *See* 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the Superior Court of New Jersey, Law Division, Special Civil Part, Small Claims, Essex County. *See* Ex. “B.”

8. Written notice of this Notice of Removal of this action is being caused to be served on the Plaintiff.

WHEREFORE, Defendant Transworld Systems Inc. gives notice that this action is removed from the Superior Court of New Jersey, Law Division, Special Civil Part, Small Claims, Essex County, to the United States District Court for the District of New Jersey.

Dated: February 28, 2025

Respectfully submitted

/s/ Aaron R. Easley

Aaron R. Easley, Esq.

SESSIONS, ISRAEL & SHARTLE, LLC

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Counsel for Defendant

Transworld Systems Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025, a copy of the foregoing was electronically filed with the Clerk of the Court, United States District Court for the District of New Jersey, and served via CM/ECF and Federal Express upon the following:

Paul Caldwell -Pro Se Plaintiff
158 North Maple Ave.
East Orange, NJ 07017

By: /s/ Aaron R. Easley

Aaron R. Easley

Counsel for Defendant,

Transworld Systems Inc.